

**Richard O. Cunningham
202.429.6434**

**PUBLIC VERSION
Confidential Business Information
Deleted from Single Brackets [] at page 1**

November 13, 2001

Via E-mail

Gloria Blue
Executive Secretary
TPSC, Office of the U.S. Trade Representative
600 17th Street, N.W.
Washington, DC 20508

Re: Steel 201, Request To Reclassify a Product for Section 203 Import Relief
– Forging Quality Round Cornered Square Carbon Billets

Dear Ms. Blue:

This request is submitted on behalf of Corus Group, plc. It serves to notify the TPSC that the International Trade Commission (ITC) misclassified a billet product as a slab during its investigation. The product at issue, Forging Quality Round Cornered Square Carbon Billets – HTS 7207.20.00.25¹ – is by all accounts a billet. It is a semifinished product of iron or nonalloy steel containing by weight 0.25 percent or more of carbon of rectangular (including square) cross section having a width measuring less than four times the thickness. Corus requests that TPSC take account of this error and correct it in its analysis.

There is ample evidence to support the claim that this square semifinished product is a billet and not a slab. In fact, the ITC Staff Report confirms the true character of the product.

¹ Specifications for this product are: [

]

The staff report describes slabs as being rectangular and billets as being square. Staff Report OVERVIEW-10. The staff specifically notes that “{s}labs of carbon steel have a rectangular cross-section . . .” Staff Report FLAT-1. The product in question is square, and thus is a billet that has been classified incorrectly as a slab.

As further proof, a product, HTS 7207.11.00.00, having a nearly identical description to the product at issue, with the exception of the amount of carbon, is classified by the ITC as a billet. The only true difference between the two products is the amount of carbon. The shape is exactly the same. Both products are used as semifinished steel used in long products. It is irrational that two products with the exact same shape and uses are classified differently due to the carbon content. If the carbon content is the only criteria used to classify products as being in a particular category, producers will simply alter the carbon content to avoid quotas, tariffs, and duties on subject goods.

Corus proposes two alternative solutions to this misclassification error. As the ITC has determined that imports of billets are not a substantial cause of serious injury to U.S. producers, the USTR should grant manufacturers of HTS 7207.20.00.25 an exclusion due to its character as a billet even if it has been improperly classified as a slab. Alternatively, Forging Quality Round Cornered Square Carbon Billets – HTS 7207.20.00.25 – should be reclassified as a billet for purposes of relief.

In accordance with 19 C.F.R. § 2003.6, Corus requests confidential treatment for certain factual information on page 1 of this letter marked in single brackets and deleted from the public version of this letter. This information is Corus commercial information, specifically the exact

specifications of the product at issue as sold by Corus, the disclosure of which would cause substantial harm to the competitive position of the company.

Respectfully submitted,

A handwritten signature in cursive script, reading "Tina Potuto Kimble".

Richard O. Cunningham

Peter Lichtenbaum

Tina Potuto Kimble

Kathleen M. Graber

Counsel for Corus Group, plc.